

IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

UNITED STATES OF AMERICA,)	
)	
Plaintiff-Appellee,)	
)	
v.)	No. 22-4689
)	
DIANA TOEBBE,)	
)	
Defendant-Appellant.)	

UNOPPOSED MOTION FOR AN EXTENSION OF TIME

The United States of America hereby respectfully moves this Court for an additional thirty (30) days in which to file its brief in the above-captioned matter.

In support of the motion, the United States submits the following:

1. The defendant's opening brief was due on April 24, 2023, and filed on April 19, 2023. *See Order, United States v. Toebbe*, No. 22-2689 (4th Cir. Mar. 10, 2023). The defendant earlier requested (and received) an extension of time to file her brief, which the United States did not oppose. The United States' brief is currently due on May 15, 2023. *Id.*

2. Additional time is needed because undersigned counsel, Danielle Tarin, did not participate in the proceedings below in this matter and, accordingly, requires additional time to become familiar with the record. Additional time is also needed because of the press of other matters and pre-planned annual leave.

3. This is the United States' first request for an extension since the defendant filed her brief.

4. Jessica Carmichael, counsel for Defendant-Appellant, having been informed of this motion, does not oppose it.

For the foregoing reasons, the United States respectfully requests that this Court allow the United States' brief to be filed no later than June 14, 2023.

Respectfully submitted,

//s//

Danielle Tarin
Attorney for the United States
U.S. Department of Justice
National Security Division
950 Pennsylvania Ave., NW
Washington, DC 20530
Phone: (202) 532-4493
Facsimile: (202) 353-3880
danielle.tarin@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice to the following registered CM/ECF users:

Jessica Carmichael
Carmichael Ellis & Brock, PLLC

Barry Philip Beck
Power, Beck & Matzureff

Counsel for Appellant

By: //s//
Danielle Tarin
Attorney for the United States
U.S. Department of Justice
National Security Division
950 Pennsylvania Ave., NW
Washington, DC 20530
Phone: (202) 532-4493
Facsimile: (202) 353-3880
danielle.tarin@usdoj.gov